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May 24, 2018

### Via ECF

Hon. Denise L. Cote  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Guzman, et al., v. Thomas T. Hecht, et al.*, 18-cv-03947 (DLC)

Dear Judge Cote:

We write to notify the Court that the parties have entered a stipulation extending defendants' time to answer the Complaint in the above-referenced manner, a copy of which is attached. This stipulation was sent to the Orders and Judgments Clerk earlier today.

Thank you for your attention to this matter.

Very truly yours,

Catherine M. Foti

cc: Counsel for all parties (via ECF)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

FRANCISCO GUZMAN, ROSARIO AYALA,  
MANUEL FLORES DOMINGUEZ, NELY  
OLMOS FLORES, ERNESTO MEJIA  
GONZALEZ, ONEIDA TACUBA MEJIA,  
MARIO ENRIQUE MUÑOZ, GREGORIO  
PEREZ ORTEGA, PATRICIA PAVIA, ROSA  
PEREZ, ALICIO RAMOS, MARTIN TORRES  
REYES, S.F.C., D.P.C., B.R.E., O.C.F., R.M.F.,  
A.M.M., J.M., M.M., A.M.O., E.G.R., F.T.R.,  
R.M.R., J.C.R., F.T.V., AND MAKE THE ROAD  
NEW YORK;

Plaintiffs,

v.

THOMAS T. HECHT, LEONARD H. HECHT,  
THOMAS T. HECHT., P.C., AND LUIS  
GUERRERO;

Defendants.

Civil Action No.: 18-cv-03947

**STIPULATION AND ORDER**

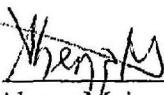
IT IS HEREBY STIPULATED AND AGREED, by and between plaintiffs, by and through their undersigned attorneys Cleary Gottlieb Steen & Hamilton LLP, the Kathryn O. Greenberg Immigration Justice Clinic at Benjamin N. Cardozo School of Law, and Make the Road New York, defendants Thomas T. Hecht, Leonard H. Hecht, and Thomas T. Hecht, P.C., by and through their undersigned attorneys Morvillo Abramowitz Grand Iason & Anello, P.C., and defendant Luis Guerrero, by and through his undersigned attorney Scott B. Tulman, Esq., that the time for the defendants to move with respect to, answer, or otherwise respond to the Complaint is extended to and including July 9, 2018.

IT IS FURTHER HEREBY STIPULATED AND AGREED that, in the event that any defendants move to dismiss the Complaint, plaintiffs must file any opposition to any motion(s) to dismiss by August 23, 2018, and defendants will file their reply (or replies) to plaintiffs' opposition by September 24, 2018.

IT IS FURTHER HEREBY STIPULATED AND AGREED that the defendants reserve all rights, defenses, and objections they may have, and entry into this stipulation shall not impair, waive, or otherwise affect any such rights, defenses, or objections.

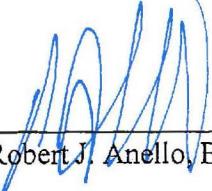
IT IS FURTHER HEREBY STIPULATED AND AGREED, by and among the undersigned, that this stipulation may be executed with facsimile signatures and in counter-parts and that it may be filed without further notice once it is fully executed by the parties.

Dated: New York, New York  
May 24, 2018

By:   
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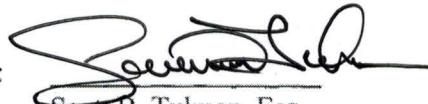
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*Attorneys for Defendant Luis Guerrero*

SO ORDERED:

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Hon. Denise Cote  
United States District Judge